



September 30, 2011

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *Telecommunications Relay Service ("TRS") & Speech-to-Speech Services for
Individuals with Hearing and Speech Disabilities*
CG Docket No. 10-51

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 0.459, Purple Communications, Inc. ("Purple") hereby requests confidential treatment for the confidential portions of the attached report for Video Relay Services (VRS). These portions of the report contain company-specific, proprietary commercial information that is not routinely available for public inspection and is safeguarded from competitors. Accordingly, it should be protected from disclosure pursuant to 47 C.F.R. § 0.457(d) and Exemption 4 of the Freedom of Information Act, 5 U.S.C. § 552(b)(4). Below please find a statement of the reasons for withholding the materials from inspection as well as relevant facts surrounding this request.

1. Identification of the specific information for which confidential treatment is sought – Purple requests that the pages of the attached presentation that are marked "CONTAINS CONFIDENTIAL INFORMATION – NOT FOR PUBLIC INSPECTION" and that are redacted in the public version of the presentation be treated as confidential.

2. Identification of the Commission proceeding in which the information was submitted or a description of the circumstance giving rise to the submission – Purple is providing this information per the requirements of 47 C.F.R. §64.604(N)(2).

3. Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged – The information at issue is highly confidential and specific to Purple. It details information related to Purple's call centers. This information is sensitive for competitive reasons. It is safeguarded from competitors and is not made available to the public. If this information is not protected, other VRS providers may utilize it to compete against Purple more effectively.

4. Explanation of the degree to which the information concerns a service that is subject to competition – This information concerns VRS, a service that is subject to substantial competition.

5. Explanation of how disclosure of the information could result in substantial competitive harm – The disclosure of this information could cause substantial competitive harm to Purple. Because other VRS providers would have access to significant information regarding Purple's infrastructure, they could use that information to compete more effectively against Purple and undermine Purple's position in the VRS marketplace.

6. Identification of any measures taken by the submitting party to prevent unauthorized disclosure – Purple routinely treats this information as highly confidential and takes significant care to ensure that it is not disclosed to its competitors.

7. Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties – Purple does not make this information available to the public, and this information has not been previously been disclosed to third parties.

8. Justification of the period during which the submitting party asserts that the material should not be available for public disclosure – Purple requests that this information be treated confidential on an indefinite basis because it cannot identify a certain date at which this information could be disclosed without causing competitive harm to Purple.

9. Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted – This information is being provided per the requirements of 47 C.F.R. §64.604(N)(2).

If a request is submitted for disclosure of this information, please provide sufficient notice to the undersigned to allow Purple to take appropriate steps to safeguard the confidentiality of the information. In addition, should this request for confidentiality be denied, Purple requests that this information be returned by the Commission without consideration.

If there are any questions regarding this request, please do not hesitate to contact me.

Sincerely,

/s/
Kelby Brick, Esq.
Vice President, Regulatory & Strategic Policy